

# **EXHIBIT C**

**Victor A. Carr & Associates**

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October 18, 2024

Invoice No. 2253

DANIEL GARZA

EDDY CISNEROS

Matter Number: 4122377 GARZA v. BORENSTEIN CATERERS INC  
For Services Rendered Through 10/18/2024.

**Fees**

<u>Ticket #</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
<u>1</u>	8/26/2022	VIC	Initial consultation with Eddy Cisneros & Ruby, diary	1.20	\$480.00
<u>2</u>	10/17/2022	VIC	Initial consultation with Daniel Garza	1.00	\$400.00
<u>3</u>	10/18/2022	VIC	Conflicts check; setup file in system; setup diaries; initial Westlaw research "exempt employees"	2.20	\$880.00
<u>4</u>	11/2/2022	VIC	Draft & email retainer to Eddy Cisneros	0.30	\$120.00
<u>5</u>	11/3/2022	VIC	Setup form Verified Complaint in Wage & Hour Overtime case; Westlaw research	3.40	\$1,360.00
<u>6</u>	11/3/2022	VIC	Search Secretary of State & Internet to identify defendants; draft and mail initial claim letter	0.50	\$200.00
<u>7</u>	11/23/2022	VIC	Telephone conference with deft's atty; file review	0.70	\$280.00
<u>8</u>	2/10/2023	VIC	Review file; westlaw research; search court sebsite; obtain forms; draft & efile complaint	6.20	\$2,480.00
<u>9</u>	2/11/2023	VIC	Edit and revise complaint; draft verification; email to clients	1.30	\$520.00
<u>11</u>	2/21/2023	VIC	Receipt & review of email from client; reply	0.40	\$160.00
<u>12</u>	2/23/2023	VIC	Receipt & review of email from client; reply	0.20	\$80.00
<u>13</u>	3/8/2023	VIC	Receipt & review of court notice; re: cover sheet	0.30	\$120.00
<u>14</u>	3/20/2023	VIC	Receipt & review various emails from client and defense counsel; file review	0.50	\$200.00
<u>15</u>	4/28/2023	VIC	Receipt & review email from client; review pension provisions; research & reply	0.70	\$280.00
<u>16</u>	5/10/2023	VIC	Receipt & review email from client	0.20	\$80.00
<u>17</u>	5/19/2023	VIC	Telephone with Ruby Cisneros	0.60	\$240.00
<u>18</u>	5/31/2023	VIC	Receipt & review email from client	0.20	\$80.00
<u>19</u>	8/24/2023	VIC	Telephone with Daniel Garza; re- pension issues	0.60	\$240.00
<u>20</u>	9/5/2023	VIC	Receipt & review email from client	0.20	\$80.00
<u>21</u>	10/11/2023	VIC	Email from process server & reply	0.40	\$160.00
<u>10</u>	10/13/2023	VIC	Draft & e-file letter to Court with Affidavits of Service; draft & e-file Summons	0.60	\$240.00

<u>22</u>	10/17/2023	VIC	Receipt & review affidavits of service	0.50	\$200.00
<u>23</u>	11/2/2023	VIC	Receipt & review of Defendants' Answer to Complaint	0.80	\$320.00
<u>24</u>	12/4/2023	VIC	Receipt & review of email from defense counsel	0.20	\$80.00
<u>25</u>	12/22/2023	VIC	Receipt & review of Scheduling Order, diary; file review	0.40	\$160.00
<u>27</u>	12/27/2023	VIC	Begin set-up of Response to Scheduling Order	1.00	\$400.00
<u>28</u>	1/5/2024	VIC	Draft Response to Scheduling Order, 1st draft; collate exhibits; email to clients	2.40	\$960.00
<u>29</u>	1/8/2024	VIC	Emails to clients; finish Response to Scheduling Order & email	1.70	\$680.00
<u>30</u>	2/22/2024	VIC	Receipt & review of emails from deft's atty; file review; research and compute damages	2.90	\$1,160.00
<u>31</u>	3/4/2024	VIC	File review; re-compute damages calculation with pension; email and telephone with deft's atty	2.60	\$1,040.00
<u>32</u>	3/15/2024	VIC	Teams conference with deft's attys & MD	1.30	\$520.00
<u>33</u>	3/16/2024	VIC	Consult with pension experts; research pension plan docs & collective bargaining agreement; emails with deft's atty and clients	2.00	\$800.00
<u>34</u>	3/19/2024	VIC	Receipt & review of pension plan documents from deft's atty; email to clients	0.70	\$280.00
<u>35</u>	3/21/2024	VIC	Receipt & review of additional pension plan documents from deft's atty; scan and email to clients	0.50	\$200.00
<u>36</u>	5/1/2024	VIC	Conference call with Mediator Barry Gold & Deft's attorney	0.50	\$200.00
<u>37</u>	5/10/2024	VIC	Receipt & review of Mediation Agreement, sign & forward	0.30	\$120.00
<u>38</u>	5/23/2024	VIC	Attendance at Mediation Hearing (all day)	4.80	\$1,920.00
<u>39</u>	6/6/2024	VIC	Receipt & review of Cheeks letter motion from deft's atty; sign & return settlement documents	1.00	\$400.00
<u>40</u>	10/11/2024	VIC	Receipt & review Memorandum and Order; emails & telephone with deft's atty	0.80	\$320.00
				<b>Billable Hours / Fees:</b>	<b>46.10      \$18,440.00</b>

### Timekeeper Summary

Timekeeper VIC worked 46.10 hours at \$400.00 per hour, totaling \$18,440.00.

### Cost Detail

ID	Date	Description	Amount
<u>29824</u>	4/11/2023	FILING FEE CC ck#7819	\$402.00
<u>30029</u>	10/24/2023	Process Service - Servico ck#8034	\$92.00
<u>30076</u>	12/12/2023	Summons & Complaint - Intercounty Judicial Services ck#8082	\$444.20
<u>30261</u>	7/10/2024	Mediation/Arbitration Fees - Davis Wright Tremaine LLP ck#8283	\$612.50
			<b>Total Costs</b>
			<b>\$1,550.70</b>

### **Current Invoice Summary**

<b>Prior Balance:</b>	\$0.00
<b>Payments Received:</b>	\$0.00
<b>Unpaid Prior Balance:</b>	\$0.00
<b>    Current Fees:</b>	\$18,440.00
<b>    Advanced Costs:</b>	\$1,550.70
<b>SUBTOTAL AMOUNT DUE:</b>	<b>\$19,990.70</b>
<b>COURTESY FEE REDUCTION:</b>	<b>- 2,490.70</b>
<b>TOTAL AMOUNT DUE:</b>	<b>\$17,500.00</b>
<b>PAYABLE BY EDDY CISNEROS:</b>	<b>\$8,750.00</b>
<b>PAYABLE BY DANIEL GARZA:</b>	<b>\$8,750.00</b>